



Kailua WWTP Draft Permit and Fact Sheet

Dan Connally to: Lum, Darryl C
Cc: "Poentis, Kris T", Elizabeth Sablad

01/11/2013 11:30 AM

Hey Darryl,

Attached are the draft permit and draft fact sheet for Kailua WWTP.

These was actually a pretty straight forward permit, but there are a couple things to be aware of:

-We only had one dilution value from the previous permit and the Permittee's 1985 study, however it was the minimum dilution, which is the most conservative. We used this conservative dilution value to calculate effluent limitations for all the 11-54 parameters (where appropriate). Because we did not have an average dilution value, we were not able to use the less stringent dilution to calculate effluent limitations based on human health standards for carcinogens (we used the minimum dilution, which should be more conservative). This is explained in the Fact Sheet in more detail (Part D.2.c.(3), page 11).

-We implemented your comments for Sand Island, including the application of the geomean over a calendar year and the accelerated monitoring trigger. We also removed the requirement for semi-annual SIU reports.

-There may be an issue with turbidity that we'll need to discuss. Basically, the receiving water is already greater than the WQS for turbidity, and the Discharger is discharging effluent well above the WQS. This version of the permit is silent on the subject, but it's probably something we should discuss.

-Additional minor comments and requests for guidance are included using tracked changes within the documents.

If you have any questions, comments, or concerns regarding this permit, please feel free to call or email me.

Thank you,

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